REMARKS

Claims 1-32 were pending in the application. Claims 1-32 were rejected under 35 U.S.C. 102(e) as being anticipated by Dziesietnik (6,429,949). The applicant traverses the rejections and requests reconsideration in view of the following remarks.

The Examiner states that "Dziesietnik either explicitly or inherently teaches all of circuitry of claims 1-32".

The application describes techniques for optimizing a process for separating a document that has patterns into color layers, e.g., cyan, magenta, yellow, and black layers if the CMYK color model is used. A pattern is an example of a container. It contains one or more graphical elements.

A color separation is created for a pattern within the document. Color separations for a given pattern are created only once when a first object with the given pattern is encountered and they are stored as "separated element[s]" (claims 1, 21, 22, 25, 26, 31 and 32). The "separated element[s]" associated with the given pattern (e.g., cyan element, magenta element, and so on) are reused to create color separations for every other object that has the given pattern.

Dziesietnik describes a method for rendering a page that has one or more objects (column 1, lines 43-49). The page is represented as a collection of patches that tile the entire page (FIG. 1, column 1, lines 57-58). The patches are stored in compressed form (FIG. 1, column 1, lines 49-57). When the page is rendered, a patch on the page is decompressed and stored in decompressed form in the cache (FIG. 1, column 1, lines 53-57).

Nothing in Dziesietnik suggests that patches that are stored in the cache are separated elements. A patch in Dziesietnik is associated with a particular "rectangular area of the page" (column 2, lines 23-25) and not with a particular color layer. Accordingly, Dziesietnik does not teach or suggest creating and reusing "separated element[s]", as recited, for instance, in independent claims 1, 21, 22, 25, 26, 31 and 32. Moreover, because a patch in Dziesietnik is not associated with a particular color layer, Dziesietnik does not teach or suggest "for each color layer [...]creating [a] representation of [a] graphical container and adding the representation of

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the graphical container to the cache" as recited, for instance, in independent claims 11, 23 and

24. For at least these reasons, claims 1-32 are allowable.

     Please apply any charges or credits to deposit account 06-1050.

                   Respectfully submitted,

Date: 15 Oct 04

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